

Exhibit 19

No. 13

4-25) Has SPP identified any issues related to congestion, pricing, transmission or any such matters that will impact the pricing in the Company's zone? Please explain and provide relevant documentation.

Response: No. While congestion has occurred from time to time at some of NorthWestern's pricing locations, we are not aware of any specific persistent issues identified by SPP.

As part of the transmission planning process of SPP, SPP performs several congestion-based studies, which include in-depth analyses of the most congested flowgates in the SPP footprint, and identify transmission investments that would be required to address chronic congestion. In its Spring 2016 State of the Market Report, the SPP Market Monitoring Unit identified the most congested transmission corridors and their associated flowgates in the SPP footprint. This report also includes a list of transmission projects that are proposed or under construction that will help alleviate the congestion. SPP Transmission Planning reports provide detailed information on each of the individual projects. As noted in the Spring 2016 State of the Market Report, the regions experiencing the most congestion in SPP are the Texas Panhandle corridor, the Western Oklahoma corridor, and the Western Kansas corridor—not areas within NorthWestern's SPP footprint.

The 2016 State of the Market Report is available at the following link:

https://www.spp.org/documents/39211/spp_gsom_2016spring.pdf

See also SPP's 2015 Integrated Transmission Plan at the link below:

https://www.spp.org/documents/26141/final_2015_itp10_report_bod_approved_012715.pdf